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Blind Spot Mirrors Consultation Paper published From: road safety  
Sent: mardi 9 mai 2006 11:19  
To: TREN E3 CONSULTATION  
Cc: SCHMITZ Peter (TREN)  
Subject: PS Comments based on the publication of the Blind Spot Mirrors  
Consultation Paper A21792

European Commission

Directorate General for Energy and Transport

Road Safety Unit

"Blind Spot"

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Subject: Comments on Blind Spot Mirrors Consultation Paper 12 April 2006

Dear Mr. Schmitz,

Thank you for sending us the Blind Spot Mirrors Consultation Paper on 12th of April 2006. In this paper you are asking us for comments.

First of all, we would like to mention, that it is a good step forwards towards the goal of the European Union to make the roads throughout Europe safer. With great respect for your efforts so far we may give you a firm compliment with this proposal. Based on the questions you were asking us to react upon we will be happy to help as far as possible to arrange the best for the transporters (lower cost) and other very vulnerable road users as: two wheel motor drivers, moped drivers, cyclists, pedestrians but also passenger car drivers that may be involved in a blind spot accident (safer roads). Positive fact is that passenger car drivers are in general not heavily injured or dead, but the effect on traffic and road safety is also in this case of importance.

For the quality of life of young children, their parents and elderly people it is of great importance to implement this EC regulation for blind spot mirror on existing trucks as soon as possible.

You were asking us to react and indicated that you are especially interested in the following questions:

1.. Do the benefit of retrofitting existing trucks built in or after 1998 outweigh the costs?

In the Report of Jacobs Consultancy it was already indicated that it is very cost effective to implement measurements for better side viewing systems on already new trucks up from January 2006 also for existing trucks, with the remark that every year of delays it will influences the financial results of this measurement, but it ever keep its positive effect on higher road safety!

Up until now there is already an obligation for better side viewing systems on all existing trucks in The Netherlands, Belgium (01/01/03) and Denmark (1/10/04). So far as we are well informed there is now regulation for existing trucks in Germany, only the transporters are free to make their own measurements to improve the field of vision, no obligation so far, only a "Freiwilliger Pflicht"

In your proposal of retrofitting blind spot mirrors is represented a calculation of the costs and benefits. The result of this calculation speaks from 1.200 saved lives and an estimated cost benefit ratio of 3,5. In the report of Jacobs Consultancy was calculation based on a number of 1.300 saved lives and a cost benefit of 4.1? In addition to this Jacobs Consultancy indicated that a

decreased cost of the used mirrors will lead to a climbing cost benefit ratio. Is this correct?

Based on this information it may be expected that if the cost price of side viewing systems is declining with for example 30%: the cost benefit ratio will increase for example to 5.5.

On certain types of trucks it is not possible to mounting a replacement mirror glass in the existing housing for these trucks, same goes for all other types of trucks as vehicles that do not have a European type approval as well as specialised trucks. For all these, there is the possibility to mount an extra inside or outside mirror to take care of the problem. These mirrors have an official approved e-number in accordance with Directive 2003/97/EC, meaning that there is no additional and individual inspection needed. The cost of these extra mirrors are substantial lower than replacement of all existing mirror systems of mirror glass, so the cost benefit ration will become in this case even more interesting and will be of interest even for trucks that are even older than 1998 as well, as the cost of fitting these extra mirrors will be justifiable.

2.. Is the approach, including the discussion of alternative solutions, the correct one?

The question is easy to answer because alternative solutions of an extra inside or outside blind spot mirror is permitted based on the fact that this mirrors have an official approved e-number in accordance with Directive 2003/97/EC. When this is the case such a mirror, with a type approval according to Directive 2003/97/EC needed no individual inspection. That's the idea of type approval. The field of vision of an extra in- our outside blind spot mirror adds an additional field of vision between the area visible directly through the window and the field of vision in the class IV and V mirrors. In this way a near complete view on the 'blind spot' at the right hand side (not driver side) of the truck is created, which can lead to a significant contribution to traffic safety (see parabola in your Figure 2 - Field of vision of the extra blind spot mirror used in the Netherlands, Belgium and Denmark). Related to this conclusion you wrote: under 3.3: "The additional blind spot mirror may have an advantage, although it was not retained by the Directive 2003/97/EC as the best solution", please can you specify your remark?

As far as we know there is no system that can replace direct view or views through mirrors or camera systems to see the field of vision as stipulated in 2003/97/EC. A radar system as mentioned is completely new in this respect. Please can you clarify this proposal more in detail?

The mentioned type of trucks that can be not mounted with a standard mirror glass or mirror (as indicated round 50% of all the existing trucks), can full fill the required field of vision through a extra inside or outside blind spot mirror official approved e- number in accordance with Directive 2003/97/EC. The remark that there is a gap between the filed of vision of the class IV and class V mirror is in practice hardly a fact. The extra in- or outside blind spot mirror together with the existing mirrors covers in most practical situations the added field demanded by the new Directive for the mirrors of class IV and V.

The expected price of an extra in- or outside blind spot mirror will be below the indicated price of € 150 as mentioned in the proposal. In that case the cost benefit ratio of retrofitting blind spot mirrors for all existing trucks throughout Europe will be better than 3.1 and may go to 5.5!

3.. The manufacturers' views on the limitation of scope of retrofitting obligation to vehicles having European type approval.

A directive that is excluding non approved vehicles based on the EC type approval is lowering the potential effect of better side viewing systems on all trucks on the road throughout all European roads. It is already a great goal to lower the road traffic victims with 50% from 2000 to 2010. so all possibilities to reach this goal of saving life's, as well as measurements to increase higher

to quality of life of potential injured road victims, must be taken into consideration.

In line with this goal it is good to keep clear that the field of vision for side viewing systems must be cover at least the required field of vision confirming 2003/97/EC. In all cases but certainly if there is no possibility to change the mirror glasses or even the complete mirror housing on the existing trucks there is always the possibility to mount an extra inside or outside blind spot mirror. With these mirrors the required field of vision in accordance with 2003/97/EC is accomplished and the view is even better than indicated in this regulation (see your figure 2). If it should be decided that it will be allowed to reduce the field of vision for retrofit purposes it would moving away from the purpose of the regulation and that can not be the intention.

Also for specialised HGV can also be full fill the requirements of the mentioned field of vision can be met by mounting an inside or outside mirror. When this is taken in to the regulation, it will have a positive effect on road safety as well.

#### 4.. Other comments or questions

It is correct what Jacobs Consultancy was writing that a number of accidents happened close to the cabin. But in order to predict the foreseen direction of the truck and other road users which may lead to a dangerous situation or even a collision; therefore it is needed to have a complete view on the right side of the truck. In more detail: a view in the direction of which a potential victim is driving towards the truck. A bicyclist that drives 15 km per hour is driving 4 meters per second, so there are just a few seconds to react.

Beside measurements that lead to a better field of vision for the truck drivers it is important that:

1.. Adjustments of the mirrors are constantly controlled by the drivers itself. For this purpose it is meaningful to create so called mirror adjustments place near truck driver restaurants and on transport delivery areas as already realised in the Netherlands, Belgium and Denmark

2.. Permanent education especially for so called risk groups such as children on basic schools and secondary schools on the age between 8 and 16 years, there parents and elderly people.

In general it is known that an important part (some 50%) of the supply of spare parts and after sales delivery of truck parts is supplied through the independent aftermarket distributors. So the delivery of additional glass for mirror class IV and V or an additional in- or outside blind spot mirror can taken place in free competition and that will lead to lower cost to the end use and truck owners. The cost benefit ratio of this directive will become better in this case.

International institutions as the IRU, the European Cyclists' Federation, the Irish Road Haulage Association (IRHA) and European Transport Safety Counsel are asking for additional regulation to diminish blind spot victims. They prefer a directive which prescribes a field of vision that must be achieved by various technical means. How the area is made visible is a choice of the truck owner or truck user. They are asking for the introduction of a regulation for existing trucks in short notice

So far our main remarks on the question you were asking for. If you appreciate more in detail we are very happy to help you in this respect.

Thank you very much for your cooperation and "guten Erfolg!"

Kind regards,

Wilbert van Waes

Paul Sanders

Road safety lobbyist  
lobbyist

Road safety

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